

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, ex rel.
CHRISTINE MARTINO-FLEMING, Relator,

and

COMMONWEALTH OF MASSACHUSETTS,
ex rel. CHRISTINE MARTINO-FLEMING,

Relator,

vs.

SOUTH BAY MENTAL HEALTH CENTER,
INC., COMMUNITY INTERVENTION
SERVICES, INC., COMMUNITY
INTERVENTION SERVICES HOLDINGS,
INC., H.I.G. GROWTH PARTNERS, H.I.G.
CAPITAL, LLC., PETER J. SCANLON, AND
KEVIN P. SHEEHAN

Defendants.

Civil Action No. 15-cv-13065

RELATOR’S MOTION TO COMPEL ANSWERS TO INTERROGATORIES

Pursuant to Fed. R. Civ. P. 37(a)(3)(B)(iii), Relator Christine Martino-Fleming respectfully moves this Court for an order compelling Defendant South Bay Mental Health Center, Inc., (“South Bay”) to produce a complete answer to Interrogatory No. 2 of Relator’s First Set of Interrogatories to South Bay Mental Health Center, Inc. for the reasons set forth in Relator’s Memorandum of Law filed contemporaneously herewith.

Dated: February 14, 2019

Respectfully submitted,

HAMILTON WINGO, LLP

By: /s/ Christopher S. Hamilton

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***ATTORNEYS FOR PLAINTIFF-
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CERTIFICATE OF SERVICE

I, Stephen T. Blackburn, hereby certify that this document will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 14, 2019.

By: /s/ Stephen T. Blackburn